

Jim Inskeep
February 23, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTH DISTRICT OF INDIANA
CAUSE NO. 1:20-cv-00320-JMS-DML

GABRIELA NIEVES,)
)
Plaintiff,)
)
vs.)
)
CARMEL CLAY SCHOOLS, CHRIS)
PLUMB, JOHN GOELZ, AND RED ROOF)
INN,)
)
Defendants.)

The videotaped deposition by Zoom of JIM INSKEEP, a witness who appeared remotely before me, Valerie Fillenwarth, RPR, a Notary Public in and for the County of Johnson, State of Indiana, taken on behalf of the Plaintiff, with all parties appearing via Zoom, taken on February 23, 2021, commencing at 10:00 a.m. EST, pursuant to all applicable rules, with Notice as to the time and place thereof.

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<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 Mr. Jonathan C. Little</p> <p>5 Ms. Gaby Olshemski</p> <p>6 SAEED & LITTLE, LLP</p> <p>7 133 W. Market Street, #189</p> <p>8 Indianapolis, IN 46202</p> <p>9 317.721.9214 (Phone)</p> <p>10 jon@slawfirm.com</p> <p>11 gaby@slawfirm.com</p> <p>12</p> <p>13</p> <p>14</p> <p>15 FOR THE DEFENDANT CARMEL CLAY SCHOOLS:</p> <p>16 Ms. Jessica Williams Schnelker</p> <p>17 CHURCH CHURCH HITTLE & ANTRIM</p> <p>18 10765 Lantern Road, Suite 201</p> <p>19 Fishers, IN 46038</p> <p>20 317.773.2190 (Phone)</p> <p>21 jschnelker@cchalaw.com</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>ALSO PRESENT:</p> <p>Pete Zinkan, Videographer</p>	<p>1 THE VIDEOGRAPHER: Good morning. This is</p> <p>2 the videographer. We are going on the record</p> <p>3 at 9:59 a.m.</p> <p>4 Today's date is February 23rd of 2021.</p> <p>5 Here begins the video deposition of Jim Inskeep</p> <p>6 being taken by counsel for the plaintiff. The</p> <p>7 caption in this case is Nieves vs. Carmel Clay</p> <p>8 Schools, et al. The case is filed in the</p> <p>9 United States District Court for the Southern</p> <p>10 District of Indiana. This deposition is being</p> <p>11 held remotely.</p> <p>12 My name is Peter Zinkan, the</p> <p>13 videographer, and the court reporter is Valerie</p> <p>14 Fillenwarth.</p> <p>15 At this time the attorneys may state</p> <p>16 their appearance for the record, whom they</p> <p>17 represent, and the court reporter will give the</p> <p>18 oath.</p> <p>19 MR. LITTLE: Sure. Jon Little for</p> <p>20 plaintiff.</p> <p>21 MS. SCHNELKER: Jessica Schnelker for</p> <p>22 Carmel Clay Schools.</p> <p>23 MS. OLSHEMSKI: Gaby Olshemski for</p> <p>24 plaintiff, Gabriela Nieves.</p> <p>25</p>
3	5
<p>1 I N D E X O F E X A M I N A T I O N</p> <p>2</p> <p>3 DIRECT EXAMINATION..... Page</p> <p>4 Questions by Mr. Jon Little 5</p> <p>5</p> <p>6</p> <p>7 I N D E X O F E X H I B I T S</p> <p>8</p> <p>9 Deposition Exhibit No.: Page</p> <p>10 1- 1/28/19 e-mail..... 30</p> <p>11 (DEFT RESP0004607)</p> <p>12 2- 6/20/17 e-mail string..... 38</p> <p>13 (DEFT RESP0001807)</p> <p>14 3- 12/04/18 e-mail string..... 40</p> <p>15 (DEFT RESP0003906-3907)</p> <p>16 4- 12/12/17 e-mail..... 42</p> <p>17 5- 12/06/16 e-mail string..... 47</p> <p>18 (DEFT RESP0003036-3037)</p> <p>19 6- 1/5/17 e-mail..... 50</p> <p>20 (DEFT RESP0002202)</p> <p>21 7- 1/14/17 e-mail..... 50</p> <p>22 (DEFT RESP0002175)</p> <p>23 8- Newspaper Article..... 59</p> <p>24 (DEFT RESP006591)</p> <p>25</p>	<p>1 JIM INSKEEP,</p> <p>2 having been first duly sworn to tell the truth,</p> <p>3 the whole truth, and nothing but the truth,</p> <p>4 testified as follows:</p> <p>5 DIRECT EXAMINATION,</p> <p>6 QUESTIONS BY MR. JONATHAN LITTLE:</p> <p>7 Q. All right. Sir, could you state and spell your</p> <p>8 name for the record, please?</p> <p>9 A. Yes. Jim Inskeep, J-I-M, I-N-S-K-E-E-P.</p> <p>10 Q. Okay. And, Mr. Inskeep, how are you currently</p> <p>11 employed?</p> <p>12 A. I am the athletics director at Carmel High</p> <p>13 School of Carmel Clay Schools.</p> <p>14 Q. Okay. And how long have you been the athletic</p> <p>15 director at the Carmel?</p> <p>16 A. This is my 20th year in this position.</p> <p>17 Q. Okay. And before -- so that's 2001 you became</p> <p>18 the athletic director?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Okay. And before that, how were you employed?</p> <p>21 A. I've been with Carmel Clay Schools my entire</p> <p>22 career, dating back to 1997; first as a teacher</p> <p>23 and coach at Carmel Junior High; and then a</p> <p>24 year as the assistant athletic director in</p> <p>25 2000-2001.</p>

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6	<p>1 Q. Okay. When you started in 1997, who was your</p> <p>2 supervisor?</p> <p>3 A. My supervisor at that time was</p> <p>4 Principal Charles Scott.</p> <p>5 Q. Okay. And who was the head athletic director?</p> <p>6 A. At that time, it would have been Lee Lonso, I</p> <p>7 believe.</p> <p>8 Q. Okay. And when did Mr. Lonso retire?</p> <p>9 A. He switched roles after the '97 school year,</p> <p>10 '96, '97.</p> <p>11 Q. What did he switch roles to do?</p> <p>12 A. He moved from athletics director to assistant</p> <p>13 principal. And I was in another building in</p> <p>14 the district at that time and not coaching at</p> <p>15 Carmel High School.</p> <p>16 Q. Okay. Were you coaching -- did you coach at</p> <p>17 Carmel High School?</p> <p>18 A. No.</p> <p>19 Q. Oh, okay. So after Mr. Lonso became assistant</p> <p>20 principal, who was the next head athletic</p> <p>21 director?</p> <p>22 A. Bobby Cox served from 1997 to 2000 for school</p> <p>23 years.</p> <p>24 Q. Okay. Why did Mr. Cox leave Carmel?</p> <p>25 A. He left to take the assistant commissioner</p>	8	<p>1 Q. Okay. Now I notice -- is your dad or uncle,</p> <p>2 was he an athletic director at Carmel?</p> <p>3 A. No.</p> <p>4 Q. No. There was another Inskeep I saw going</p> <p>5 through the records. Who is that?</p> <p>6 A. My father was athletic director at North</p> <p>7 Central High School from 1971 --</p> <p>8 Q. Okay.</p> <p>9 A. -- to 1994.</p> <p>10 Q. Okay. But he lived, obviously, in Carmel since</p> <p>11 you went to Carmel?</p> <p>12 A. Yes.</p> <p>13 Q. Oh, okay. But your dad never was athletic</p> <p>14 director at Carmel?</p> <p>15 A. Correct. Never worked for Carmel Clay Schools.</p> <p>16 Q. All right. All right. What did you do to</p> <p>17 prepare for this deposition today besides talk</p> <p>18 to your lawyers? You don't have to tell me</p> <p>19 about conversations you had with your lawyers.</p> <p>20 A. Other than that, nothing.</p> <p>21 Q. Did you review any documents?</p> <p>22 A. Yes.</p> <p>23 Q. Which documents did you review? So you can</p> <p>24 tell me which documents you reviewed, but don't</p> <p>25 tell me what you -- if you talked with them</p>
7	<p>1 position at the Indiana High School Athletic</p> <p>2 Association.</p> <p>3 Q. Was he fired or did he leave voluntarily?</p> <p>4 A. No, he left voluntarily, to my knowledge.</p> <p>5 Q. Okay. And then you became the athletic</p> <p>6 director after that?</p> <p>7 A. I was the assistant athletic director for a</p> <p>8 year. And the athletic director at that time,</p> <p>9 we were in interim positions, was Bruce Wolf.</p> <p>10 Q. Why did Mr. Wolf leave Carmel?</p> <p>11 A. He did not. We switched roles after one year</p> <p>12 and he retired from Carmel Clay Schools this</p> <p>13 past school year in 2020.</p> <p>14 Q. So he became your boss and then you became his</p> <p>15 boss?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And before 1997, what -- did you go to</p> <p>18 college or what was the --</p> <p>19 A. Yes, I was a student at Purdue University from</p> <p>20 '92 to '96.</p> <p>21 Q. Okay. Did you play any sports or anything at</p> <p>22 Purdue?</p> <p>23 A. I did not.</p> <p>24 Q. Okay. And you went to Carmel High School?</p> <p>25 A. Yes, sir, graduated in 1992.</p>	9	<p>1 about your lawyer (verbatim), just say I read</p> <p>2 the whatever, but I don't need to know the</p> <p>3 conversation you had with your lawyer about it,</p> <p>4 just the names of the documents.</p> <p>5 A. I reviewed the two that were provided, the</p> <p>6 production of documents and the management</p> <p>7 agreement for Carmel Swim Club, Carmel Clay</p> <p>8 Schools.</p> <p>9 Q. So you -- the production of documents is like a</p> <p>10 couple thousand pages. Is that what you</p> <p>11 reviewed?</p> <p>12 A. No, I read the production of documents, our</p> <p>13 objection to the materials.</p> <p>14 MS. SCHNELKER: He's referring, Jon, to</p> <p>15 the documents that we sent yesterday, the</p> <p>16 responses to the request for production.</p> <p>17 MR. LITTLE: Oh, okay. Not the request</p> <p>18 for production for the whole case, okay.</p> <p>19 MS. SCHNELKER: Correct.</p> <p>20 BY MR. LITTLE:</p> <p>21 Q. So just the management agreement and then like</p> <p>22 a two-pager of legal why we're not going to</p> <p>23 give you this or what I'm asking for kind of</p> <p>24 thing, right?</p> <p>25 A. Yes, sir.</p>

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10	<p>1 Q. Nothing else besides that?</p> <p>2 A. I reviewed some e-mails as well during that</p> <p>3 time period that -- that potentially could have</p> <p>4 been brought up today.</p> <p>5 Q. And were those e-mails on your computer or did</p> <p>6 someone provide them to you?</p> <p>7 A. Those were provided to me.</p> <p>8 Q. By counsel?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. And besides those e-mails, anything</p> <p>11 else?</p> <p>12 A. Not to my knowledge, no.</p> <p>13 Q. Okay. Did you speak to anybody besides your</p> <p>14 attorneys about this deposition?</p> <p>15 A. No, sir.</p> <p>16 Q. Have you ever been deposed before?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And what -- when have you been deposed</p> <p>19 before?</p> <p>20 A. The year was around 2002.</p> <p>21 Q. And what were you deposed about?</p> <p>22 A. It was a lawsuit from an individual that we --</p> <p>23 with our cross country program that we said can</p> <p>24 no longer have contact with our cross country</p> <p>25 program.</p>	12	<p>1 Q. Okay. Did he end up suing the Carmel School</p> <p>2 Corporation?</p> <p>3 A. I believe so. I was not a called witness. But</p> <p>4 I do recall that there was a lawsuit, either</p> <p>5 against Carmel Clay Schools or the head coach</p> <p>6 at that time.</p> <p>7 Q. And that coach was Chuck Koeppen?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So do you know if the Carmel -- what was</p> <p>10 Mr. Trisler alleged to have done?</p> <p>11 A. I'm not sure what the actual lawsuit was. I</p> <p>12 did not see it.</p> <p>13 Q. Do you know if the Carmel schools paid</p> <p>14 Mr. Trisler?</p> <p>15 A. I do not know the answer to that.</p> <p>16 Q. Was Mr. Trisler alleged to have engaged in</p> <p>17 sexual conduct with a Carmel athlete?</p> <p>18 A. No.</p> <p>19 Q. He was not alleged to have engaged in sexual</p> <p>20 conduct with [REDACTED]?</p> <p>21 A. No, not to my knowledge.</p> <p>22 Q. Mr. -- okay. Was Mr. Trisler -- did he feel he</p> <p>23 was wrongly accused of engaging in sexual</p> <p>24 conduct with an athlete?</p> <p>25 MS. SCHNELKER: Objection. Lack of</p>
11	<p>1 Q. Was that Josh Trisler?</p> <p>2 A. No, sir.</p> <p>3 Q. Who was that?</p> <p>4 A. Schmidt was the last name, Dr. Schmidt.</p> <p>5 Q. Was he a dentist in Carmel -- in Indianapolis?</p> <p>6 A. I believe so.</p> <p>7 Q. He ended up dying of -- he fell asleep in a</p> <p>8 sauna?</p> <p>9 A. I don't know. Did he?</p> <p>10 Q. Yeah, I think so. I think that's the same guy.</p> <p>11 What was that lawsuit about?</p> <p>12 A. That individual was in violation of Indiana</p> <p>13 High School Athletic Association by-laws, was</p> <p>14 providing money to student athletes for --</p> <p>15 basically as reward for performance, which is a</p> <p>16 by-law violation.</p> <p>17 Q. Okay. And who sued you?</p> <p>18 A. That individual, Dr. Schmidt.</p> <p>19 Q. Okay. And did you end up -- do you know how</p> <p>20 that case resolved?</p> <p>21 A. I do not know.</p> <p>22 Q. Okay. Speak -- let's stick with cross country.</p> <p>23 Do you remember an individual named Josh</p> <p>24 Trisler?</p> <p>25 A. Yes.</p>	13	<p>1 personal knowledge of this witness. There's no</p> <p>2 way for him to know that.</p> <p>3 BY MR. LITTLE:</p> <p>4 Q. You can answer.</p> <p>5 MS. SCHNELKER: You can answer.</p> <p>6 Q. You can still answer.</p> <p>7 A. Okay.</p> <p>8 MS. SCHNELKER: Unless I tell you not to,</p> <p>9 you can answer.</p> <p>10 A. Sure. I'm not aware of any sexual contact</p> <p>11 between those two individuals. I do know that</p> <p>12 I questioned Mr. Trisler during that time</p> <p>13 period as an assistant coach of our cross</p> <p>14 country program because it had come to my</p> <p>15 attention that he had purchased a sports bra</p> <p>16 for [REDACTED], who was a student athlete</p> <p>17 in the program at that time. I did not feel</p> <p>18 that was appropriate at all. I questioned him</p> <p>19 about that.</p> <p>20 I also spoke with the father of [REDACTED] at</p> <p>21 that time. [REDACTED] father did not have any</p> <p>22 issue with that, which was very surprising to</p> <p>23 me.</p> <p>24 So we did release Mr. Trisler from his</p> <p>25 coaching position sometime thereafter.</p>

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14	<p>1 Q. Okay. And then he subsequently sued the Carmel</p> <p>2 School Corporation, correct?</p> <p>3 A. I believe that is the sequence there, yes.</p> <p>4 Q. Okay. And you don't -- you don't know how that</p> <p>5 suit resolved?</p> <p>6 A. No, I do not.</p> <p>7 Q. Okay. Where would I go to get a copy of the</p> <p>8 resolution of that suit? Who would I ask for</p> <p>9 that?</p> <p>10 A. I would assume that would be available at our</p> <p>11 central office, but we -- I do not have</p> <p>12 anything to that information there, no.</p> <p>13 Q. Who would you go to at your central office to</p> <p>14 get a copy of that?</p> <p>15 A. I would start with the superintendent's office.</p> <p>16 Q. Okay.</p> <p>17 A. But I'm not sure how far back those are kept</p> <p>18 over the years.</p> <p>19 MS. SCHNELKER: Jon, I can tell you it's</p> <p>20 my understanding from our client that no</p> <p>21 information concerning the lawsuits are kept</p> <p>22 past 2007. That's the farthest back it goes.</p> <p>23 MR. LITTLE: Well, we know we'll be</p> <p>24 visiting this with the Magistrate again soon,</p> <p>25 so...</p>	16	<p>1 any allegations of molestation involving Carmel</p> <p>2 swimmers?</p> <p>3 A. Not to my knowledge. He has provided various</p> <p>4 legal advice and probably services through the</p> <p>5 Carmel Swim Club over the years in my time</p> <p>6 knowing him. But, no, nothing directly with</p> <p>7 him.</p> <p>8 Q. Mr. Pylitt is not the lawyer for the Carmel</p> <p>9 School Corporation, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And as far as you know, has he ever been a</p> <p>12 lawyer for the Carmel School Corporation?</p> <p>13 A. Not to my knowledge, no.</p> <p>14 Q. Do you know a gentleman named David Day?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. Has Mr. Day been a lawyer for the Carmel</p> <p>17 School Corporation?</p> <p>18 A. Yes, he has served in, I assume, one of many</p> <p>19 roles with the school district as an attorney</p> <p>20 since my first year as an administrator.</p> <p>21 Q. Okay. Besides Mr. Day, what other lawyers are</p> <p>22 you aware of for the Carmel School Corporation?</p> <p>23 A. The one representing me today; Libby Roberts</p> <p>24 also from Church, Church, Hittle and Antrim.</p> <p>25 Most all of my -- my dealings have been through</p>
15	<p>1 MS. SCHNELKER: Okay.</p> <p>2 BY MR. LITTLE:</p> <p>3 Q. Let's see. Did you have any conversations with</p> <p>4 Chris Plumb before today's deposition?</p> <p>5 A. No, not about this case.</p> <p>6 Q. Do you know Mr. Plumb has been deposed,</p> <p>7 correct, in this case?</p> <p>8 A. That is my understanding, yes.</p> <p>9 Q. Did you talk to him after his deposition?</p> <p>10 A. No, I did not.</p> <p>11 Q. Did you talk to Jon Ranochak about his</p> <p>12 deposition?</p> <p>13 A. No, I did not.</p> <p>14 Q. Did you talk to him about your deposition?</p> <p>15 A. No, I did not.</p> <p>16 Q. Have you talked to -- do you know a gentleman</p> <p>17 named Bernard Pylitt, Bernard "Buddy" Pylitt?</p> <p>18 A. I am familiar with him, yes.</p> <p>19 Q. Have you talked to Mr. Pylitt about this case?</p> <p>20 A. No, I have not.</p> <p>21 Q. When was last time you talked to Mr. Pylitt?</p> <p>22 A. I received a text from him two weeks ago</p> <p>23 congratulating on the girls swimming state</p> <p>24 finals.</p> <p>25 Q. Okay. Have you ever talked to Mr. Pylitt about</p>	17	<p>1 that firm. I believe Alex Pinegar as well. So</p> <p>2 virtually all of those have gone through the</p> <p>3 same -- same law firm there.</p> <p>4 Q. Besides Church, Church, Hittle, any other law</p> <p>5 firms that you're aware of?</p> <p>6 A. Not -- not to my recollection.</p> <p>7 Q. Okay. Who is your supervisor at Carmel?</p> <p>8 A. My direct supervisor is Dr. Tom Harmas,</p> <p>9 principal.</p> <p>10 Q. Okay. I mean -- and that's the person who</p> <p>11 could fire you, conceivably?</p> <p>12 A. I think there's a long line of those folks,</p> <p>13 so --</p> <p>14 Q. Okay.</p> <p>15 A. -- it could be the principal, the</p> <p>16 superintendent, human resources, school board.</p> <p>17 Q. Okay. But if you -- if someone -- if you were</p> <p>18 to report to your supervisor, you believe that</p> <p>19 to be the high school principal, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. If you had -- if you had a suspicion of</p> <p>22 sexual abuse, who would -- what would you do</p> <p>23 with that information -- or those duties?</p> <p>24 A. I would speak with the authorities or with</p> <p>25 Child Protective Services.</p>

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18	<p>1 Q. Directly, you would pick up the phone and call</p> <p>2 them directly?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Have you ever had to do that in the</p> <p>5 past?</p> <p>6 A. I have not.</p> <p>7 Q. Okay. Do you know who you would call? Is</p> <p>8 there a contact number that you have?</p> <p>9 A. I have a contact number for Child Protective</p> <p>10 Services, which we provide to our -- our</p> <p>11 coaches. I also would probably call one of our</p> <p>12 school resource officers directly.</p> <p>13 Q. Okay. And is that what you would have done in</p> <p>14 2017 as well?</p> <p>15 A. Yes.</p> <p>16 Q. Specifically in December 2017?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And that's what you would have expected</p> <p>19 your coaches to do, or would you expect your</p> <p>20 coaches to come to you first?</p> <p>21 A. No, I would expect coaches to go directly to</p> <p>22 that. I think if there was a question, they</p> <p>23 might come to their supervisor requesting</p> <p>24 advice or counsel on that, and what direction</p> <p>25 to go. But, yes, that would be the direction</p>	20	<p>1 MR. LITTLE: Right. And the agendas show</p> <p>2 both a meeting with the coaches and a Safe</p> <p>3 Sport training that the kids watch before they</p> <p>4 take the bus to their meet. Like 39 -- number</p> <p>5 3906, for example. 3034.</p> <p>6 BY MR. LITTLE:</p> <p>7 Q. Do you have a copy of those actual trainings?</p> <p>8 A. That's -- those are switching two different</p> <p>9 materials there.</p> <p>10 Q. Okay.</p> <p>11 A. One is the high school preseason coaches</p> <p>12 meeting agenda notes that you have. The Safe</p> <p>13 Sport is specific to the Carmel Swim Club.</p> <p>14 Q. Okay. So how do I get a copy of both of those?</p> <p>15 A. I believe we've provided a copy of the</p> <p>16 preseason coaches meeting. I do not have a</p> <p>17 copy of the Safe Sport. That's not something</p> <p>18 I'm directly involved with.</p> <p>19 Q. So let's talk about the preseason coaches</p> <p>20 meeting. Is it like a PowerPoint or -- on the</p> <p>21 issue of Safe Sport, is it a PowerPoint? Is it</p> <p>22 a -- paper handouts? What is it?</p> <p>23 A. Safe Sport is not a term that we use. We do</p> <p>24 not use that program.</p> <p>25 Q. Okay. What do you use at the preseason coaches</p>
19	<p>1 and information that's provided to coaches.</p> <p>2 Q. And you provided that information to coaches in</p> <p>3 2017 as well?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And if a coach had a suspicion of sexual</p> <p>6 abuse, you would expect them to call -- in</p> <p>7 2017, December 2017 specifically, you would --</p> <p>8 you would expect them to go to CPS and to talk</p> <p>9 to you as well?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And where do you develop that</p> <p>12 expectation from?</p> <p>13 A. We have preseason coaches meetings where we</p> <p>14 distribute that information and other stuff</p> <p>15 pertinent to the year.</p> <p>16 Q. Okay. And I saw that on some of your</p> <p>17 materials. How do I get a copy of the</p> <p>18 presentation from 2017?</p> <p>19 A. I believe that is with our attorneys.</p> <p>20 MS. SCHNELKER: You mean a copy of the</p> <p>21 meeting notes?</p> <p>22 MR. LITTLE: No, there's like on -- oh,</p> <p>23 let's see.</p> <p>24 MS. SCHNELKER: The agenda has been --</p> <p>25 the complete agenda has been provided.</p>	21	<p>1 meeting?</p> <p>2 A. We discuss all their legal responsibilities or</p> <p>3 as many of them as we can, specifically is --</p> <p>4 things that we speak about is texting of</p> <p>5 student athletes. And also that duty and</p> <p>6 obligation to report suspicion of child abuse</p> <p>7 as well.</p> <p>8 Q. Let's talk about texting of student athletes.</p> <p>9 What do you guys -- what does the Carmel school</p> <p>10 tell its coaches about texting of student</p> <p>11 athletes?</p> <p>12 A. At that time, our policy in the athletic</p> <p>13 department was that coaches are not to contact</p> <p>14 student athletes one-on-one for conversational</p> <p>15 information. Our theme there is informational,</p> <p>16 not conversational.</p> <p>17 Q. And so that was the presentation that you made</p> <p>18 to the coaches?</p> <p>19 A. Yes, sir. And then --</p> <p>20 Q. You, personally?</p> <p>21 A. Yes. And then currently, our -- following the</p> <p>22 arrest of Mr. Goelz, we subsequently revised</p> <p>23 that and now we have three-way communication</p> <p>24 between coaches and student athletes so that</p> <p>25 there's no one-on-one contact via any of those</p>

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22	<p>1 communication uses that they have between apps</p> <p>2 and everything else and direct texting.</p> <p>3 So they either have to copy in another</p> <p>4 coach, or it could be a coach to the whole</p> <p>5 group of athletes, or it could be a coach with</p> <p>6 the parent and the student athlete.</p> <p>7 Q. And where did you develop that policy from?</p> <p>8 A. That came out of our discussions on how to keep</p> <p>9 kids safe.</p> <p>10 Q. And how do you monitor that policy?</p> <p>11 A. We've told our student athletes that, you know,</p> <p>12 all those communications should be three-way.</p> <p>13 So if you are receiving one-on-one texts that</p> <p>14 are not informational, if you're receiving a</p> <p>15 one-on-one communication from your coach,</p> <p>16 you're under no obligation to respond to that.</p> <p>17 And also you should report that to someone in</p> <p>18 administration or your parents to look at that</p> <p>19 further.</p> <p>20 Now, I understand there's obviously</p> <p>21 the -- I'm sending out an informational --</p> <p>22 information that's pretty significant there,</p> <p>23 just a, you know, I'm going to miss practice</p> <p>24 today. But when we start talking about other</p> <p>25 types of communications that are inappropriate</p>	24	<p>1 Q. And it's your expectation today, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Turning back to this case, have you</p> <p>4 spoken to any media about this case?</p> <p>5 A. No, I have not.</p> <p>6 Q. Any family or friends about -- and I'm asking</p> <p>7 you, I realized, to go back to -- let me ask --</p> <p>8 let's start here. When did you first learn</p> <p>9 that Mr. Goelz may have had an inappropriate</p> <p>10 relation- -- may have had illegal sexual</p> <p>11 contact with Ms. Nieves?</p> <p>12 A. At the time of his arrest.</p> <p>13 Q. Okay. And what did you do when you found out</p> <p>14 about Mr. Goelz's arrest?</p> <p>15 A. I can't remember if I was told directly from</p> <p>16 someone in the school district or from a</p> <p>17 contact with the police at the time of their</p> <p>18 arrest, I don't remember exactly the specifics</p> <p>19 of that. But right at that time period, then I</p> <p>20 did speak with the principal and our new</p> <p>21 superintendent at that time, Dr. Michael</p> <p>22 Beresford.</p> <p>23 Q. Okay. And what did the superintendent have to</p> <p>24 say?</p> <p>25 A. Well, same response as mine, which was, you</p>
23	<p>1 or well beyond the scope of informational, then</p> <p>2 obviously that is a violation of our -- our</p> <p>3 policy.</p> <p>4 Q. You would agree with me that coaches -- let's</p> <p>5 go -- let's do first December 2017. Coaches at</p> <p>6 Carmel High School should not be texting</p> <p>7 athletes about boyfriends, correct, about the</p> <p>8 athletes' boyfriends?</p> <p>9 A. That is correct.</p> <p>10 Q. They shouldn't be texting them about trouble</p> <p>11 with their home life, correct?</p> <p>12 A. That is correct.</p> <p>13 Q. Okay. And if an athlete in 2017 was receiving</p> <p>14 texts like that from those coaches and another</p> <p>15 coach on the staff knew about it, you would</p> <p>16 have liked to have been aware of that, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And the coach who was aware of the</p> <p>19 inappropriate text by one of his fellow</p> <p>20 coaches, that coach should have told you when</p> <p>21 he became aware of that, correct?</p> <p>22 A. Yes, that would be my expectation.</p> <p>23 Q. And that would have been your expectation in</p> <p>24 December 2017 as well, correct?</p> <p>25 A. Yes.</p>	25	<p>1 know, disgust and anger and, obviously, we were</p> <p>2 concerned for the student in that situation as</p> <p>3 well.</p> <p>4 Q. Okay. Did you ever reach out to Gabriela or</p> <p>5 her family?</p> <p>6 A. No, I did not.</p> <p>7 Q. Why not?</p> <p>8 A. That was being handled through our counseling</p> <p>9 center. And I was not even provided the name</p> <p>10 of the student athlete involved until much</p> <p>11 later on.</p> <p>12 Q. When did you get the name of the student</p> <p>13 athlete involved?</p> <p>14 A. I believe it was sometime in the fall, if I'm</p> <p>15 not mistaken, when it was determined that she</p> <p>16 was going to go back out for the swim team.</p> <p>17 Q. How did you get her name?</p> <p>18 A. I do not recall that.</p> <p>19 Q. Okay. Did you reach out to her then, when you</p> <p>20 found out she was going to go back out for the</p> <p>21 swim team?</p> <p>22 A. No, I did not.</p> <p>23 Q. Why not?</p> <p>24 A. That was being handled through her counselor</p> <p>25 and other support systems that had been</p>

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26	<p>1 established.</p> <p>2 Q. And who -- who is -- who else was in that</p> <p>3 support system besides her counselor?</p> <p>4 A. I do not recall at that time who else was</p> <p>5 involved in that, but I'm fairly certain</p> <p>6 counselor and social worker would be the normal</p> <p>7 protocol there, trying to keep it as normal as</p> <p>8 possible for her after this situation.</p> <p>9 Q. Who was the -- do you know who her counselor</p> <p>10 was?</p> <p>11 A. I do not recall that.</p> <p>12 Q. Do you know who the social worker would have</p> <p>13 been?</p> <p>14 A. I do not know. We've -- we've run through</p> <p>15 quite a few.</p> <p>16 Q. Okay. How did you first meet Mr. Goelz?</p> <p>17 A. He was brought to me by Coach Plumb as a</p> <p>18 potential assistant coach for the program.</p> <p>19 Q. Okay. And you have to approve all of the</p> <p>20 potential coaches, correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Okay. So you met him, do you remember when?</p> <p>23 A. I believe -- I don't think that was his first</p> <p>24 year, that may have been his second year, but</p> <p>25 it would have been in the fall of the first</p>	28	<p>1 Q. You'd do a background check, correct?</p> <p>2 A. Yes. He completed the background check that</p> <p>3 was required by Carmel Clay Schools.</p> <p>4 Q. Okay. And the first time you learned about any</p> <p>5 allegations of possibly illegal or</p> <p>6 inappropriate behavior by Mr. Goelz was when he</p> <p>7 was arrested?</p> <p>8 A. Yes.</p> <p>9 Q. When was the first time -- well, let me ask you</p> <p>10 this. Did you ever discuss Mr. Goelz's arrest</p> <p>11 with Chris Plumb?</p> <p>12 A. At that time of the arrest, I did discuss that</p> <p>13 with him.</p> <p>14 Q. Okay. Tell me about that conversation.</p> <p>15 A. My recollection was, you know, what happened?</p> <p>16 What do we know? Then also I serve on the</p> <p>17 Carmel Swim Club as the Carmel Clay Schools</p> <p>18 representative for that. And it's more of an</p> <p>19 informational and resource to the Carmel Swim</p> <p>20 Club. So we discussed that and how would we be</p> <p>21 responding to the -- not only the community,</p> <p>22 but obviously the Swim Club membership, most of</p> <p>23 which are Carmel High School families to, you</p> <p>24 know, have a response to what had occurred and</p> <p>25 the arrest.</p>
27	<p>1 year he joined our staff.</p> <p>2 Q. The first year he joined the Carmel High School</p> <p>3 staff?</p> <p>4 A. Correct.</p> <p>5 Q. And in December 2017, John Goelz was definitely</p> <p>6 on the Carmel High School staff, correct?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Okay. And so you met him, you approved of him</p> <p>9 being a coach. You could have fired him,</p> <p>10 correct, or -- at any time, if you had reason,</p> <p>11 correct?</p> <p>12 A. Yes, that is correct.</p> <p>13 Q. Okay. And you -- you required that he take the</p> <p>14 training that we discussed earlier, correct?</p> <p>15 A. Yes, he was a part of that preseason meeting of</p> <p>16 that information and then completed all the</p> <p>17 other requirements that we would have for any</p> <p>18 of our coaches. Our volunteer coaches are held</p> <p>19 to the same standards and requirements that we</p> <p>20 have for our paid staff as well.</p> <p>21 Q. Okay. But -- and at the end of the day -- so,</p> <p>22 I mean, he had to take a concussion training,</p> <p>23 he had to fill out whatever forms you deemed he</p> <p>24 had to fill out, correct?</p> <p>25 A. Yes.</p>	29	<p>1 Q. Okay. And was this a phone call or an</p> <p>2 in-person conversation?</p> <p>3 A. I think we did both. I think we spoke on the</p> <p>4 phone. I think we met in person as well.</p> <p>5 Q. Okay. So tell me more about it. What was</p> <p>6 the -- what was the discussion of the response</p> <p>7 of the Swim Club?</p> <p>8 A. I don't recall the specifics of that meeting,</p> <p>9 but -- but I think the overview of the</p> <p>10 conversation was, you know, how are we going to</p> <p>11 respond to this, to the parents and the</p> <p>12 families involved. And then, you know,</p> <p>13 obviously, further down the line, what other</p> <p>14 kind of steps that we're going to take to</p> <p>15 prevent this from occurring in the future.</p> <p>16 Q. Okay. Did you go to any of the criminal</p> <p>17 proceedings in this case?</p> <p>18 A. No, I did not.</p> <p>19 Q. Did you receive any updates on the criminal</p> <p>20 proceedings in this case?</p> <p>21 A. Only what was out there in the media.</p> <p>22 Q. Did you speak to any law enforcement officers</p> <p>23 about this case?</p> <p>24 A. No, not -- after the initial conversation of</p> <p>25 his arrest, no.</p>

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30	<p>1 Q. Okay. Did you do an internal investigation</p> <p>2 into this matter?</p> <p>3 A. No, we did not.</p> <p>4 Q. Did you discipline anybody in connection</p> <p>5 with -- you know, obviously besides firing</p> <p>6 Mr. Goelz -- discipline anybody in the Carmel</p> <p>7 athletic department as result of this matter?</p> <p>8 A. No.</p> <p>9 MR. LITTLE: Gaby, can you put up 4607?</p> <p>10 We'll mark this as Exhibit 1.</p> <p>11 (WHEREUPON, Deposition Exhibit 1 was</p> <p>12 marked for identification.)</p> <p>13 MR. LITTLE: Okay.</p> <p>14 MS. OLSHEMSKI: All right. Can you see</p> <p>15 that?</p> <p>16 MR. LITTLE: Yeah. Not anymore. Now I</p> <p>17 can.</p> <p>18 BY MR. LITTLE:</p> <p>19 Q. All right. Sir, can you see that exhibit?</p> <p>20 A. Yes, I can.</p> <p>21 Q. Can you take a second and just review that.</p> <p>22 A. (Witness complied with request.)</p> <p>23 Q. Is that your e-mail, jiminskeep@ -- is jln --</p> <p>24 or jinskeep@ccs k12.in.us?</p> <p>25 A. Yes, it is.</p>	32	<p>1 sharing of philosophy and providing</p> <p>2 opportunities for kids.</p> <p>3 So that relationship between the Swim</p> <p>4 Club and Carmel Clay Schools, while separate,</p> <p>5 obviously, there are some things that we -- we</p> <p>6 have together.</p> <p>7 And the Carmel Swim Club uses the</p> <p>8 natatorium, which is located on Carmel Clay</p> <p>9 School's property and is part of Carmel High</p> <p>10 School. And we had the same relationship with</p> <p>11 Carmel Dads' Club as well where they utilize</p> <p>12 facilities, and at the end of the day, serving</p> <p>13 primarily students that live in Clay Township.</p> <p>14 Q. Okay. If I wanted to --</p> <p>15 MR. LITTLE: Gaby, you can take that</p> <p>16 down. Thank you. Just remember, mark it as</p> <p>17 Exhibit 1 so we can keep it straight at the</p> <p>18 end.</p> <p>19 BY MR. LITTLE:</p> <p>20 Q. Was Buddy Pylitt consulted about making --</p> <p>21 about this statement in this case?</p> <p>22 A. I do not recall at that time.</p> <p>23 Q. Do you have any communications with Buddy</p> <p>24 Pylitt, like e-mails, from this time period or</p> <p>25 anything?</p>
31	<p>1 Q. Okay. Who is Kip?</p> <p>2 A. Kip is Kip Zurcher who was the Carmel Swim Club</p> <p>3 on the board at that time.</p> <p>4 Q. Is he an employee of the Carmel School</p> <p>5 Corporation?</p> <p>6 A. No, he is not.</p> <p>7 Q. Okay. Why was he consulted about a statement</p> <p>8 in this case?</p> <p>9 A. I don't remember if Kip was the president at</p> <p>10 that time of the Carmel Swim Club, of the</p> <p>11 board, but Kip was very involved with that.</p> <p>12 And I'm not sure if his day job is as an</p> <p>13 attorney or not. I'm not -- not familiar with</p> <p>14 his line of work, but...</p> <p>15 Q. I'm going to say why does the Carmel School</p> <p>16 Corporation care what the Carmel Swim Club says</p> <p>17 about anything at the end of the day?</p> <p>18 A. No, I think that's a very good question. And</p> <p>19 the relationship between the Carmel Swim Club</p> <p>20 and Carmel Clay Schools is very similar to the</p> <p>21 relationship between the Carmel Dads' Club and</p> <p>22 Carmel Clay Schools. Both entities exist</p> <p>23 basically as a community outreach to serve</p> <p>24 youth in our community. So there's a lot of,</p> <p>25 not only sharing of facilities, but, you know,</p>	33	<p>1 A. I do not know whether I do or not.</p> <p>2 Q. Do you have the same e-mail address now as you</p> <p>3 had then?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Okay. So if we send a request to your counsel</p> <p>6 that -- e-mails from Buddy Pylitt, that's</p> <p>7 something you could search for?</p> <p>8 A. Yes, I would assume that would be something</p> <p>9 that could be searched for.</p> <p>10 Q. Okay. And now -- just a couple of quick</p> <p>11 questions here. December 2017, Chris Plumb was</p> <p>12 definitely an employee of the Carmel Clay</p> <p>13 School Corporation?</p> <p>14 A. Yes.</p> <p>15 Q. Jon Ranochak was definitely an employee of the</p> <p>16 Carmel Clay School Corporation?</p> <p>17 A. Yes.</p> <p>18 Q. And they still are today, correct?</p> <p>19 A. Yes, both.</p> <p>20 Q. Okay. All right. If I wanted to rent the</p> <p>21 pool -- let's talk about the relationship</p> <p>22 between the Carmel Swim Club and Carmel Clay</p> <p>23 Schools. If I wanted to rent the pool for a</p> <p>24 pool party or something, right, I don't know,</p> <p>25 my kid's birthday, whatever, how much would it</p>

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34	<p>1 cost me a day to rent the pool or an hour or</p> <p>2 however you do it?</p> <p>3 A. I am not --</p> <p>4 MS. SCHNELKER: Objection, relevance. Go</p> <p>5 ahead.</p> <p>6 A. Yes, I'm not familiar with the fee structure</p> <p>7 because that's not something that's handled out</p> <p>8 of our office. But that would go through the</p> <p>9 Carmel Swim Club.</p> <p>10 BY MR. LITTLE:</p> <p>11 Q. I'd have to talk with the Carmel Swim Club to</p> <p>12 rent the Carmel High School pool?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. Have you discussed -- well, let's go</p> <p>15 back. So the Carmel School Corporation gives</p> <p>16 the Carmel Clay Swim -- or gives the Carmel</p> <p>17 Swim Club free office space, correct?</p> <p>18 A. There is an office provided in the natatorium,</p> <p>19 yes, for the aquatics director.</p> <p>20 Q. Okay. And is there any other office space</p> <p>21 provided by the Carmel Clay School Corporation</p> <p>22 to the Carmel Swim Club at all?</p> <p>23 A. There is an oversized closet in which coaches</p> <p>24 keep their stuff. But it's far from a coaches'</p> <p>25 office. The aquatics director office is really</p>	36	<p>1 Yes, the Gabriela Nieves case.</p> <p>2 MS. SCHNELKER: Go ahead, Jim.</p> <p>3 A. Not to my recollection. But it's been three</p> <p>4 years ago, so I -- if it was, it's not ringing</p> <p>5 a bell right now.</p> <p>6 BY MR. LITTLE:</p> <p>7 Q. Do you remember discussing this case at all</p> <p>8 with anybody on the Carmel Swim Club board?</p> <p>9 A. I'm sure there were conversations, but I don't</p> <p>10 recall anything specific at this time.</p> <p>11 Q. You can't recall even who you talked to or</p> <p>12 anything in these conversations?</p> <p>13 A. No.</p> <p>14 Q. Do you know if anyone from the Carmel Swim Club</p> <p>15 board has reached out to my client about this</p> <p>16 case?</p> <p>17 A. I do not know.</p> <p>18 Q. About her -- how about her parents?</p> <p>19 A. I did not know.</p> <p>20 Q. Have you, as a Carmel athletic director,</p> <p>21 reached out to her parents at all?</p> <p>22 A. No, I have not.</p> <p>23 Q. Do you know if the Carmel Swim Club did an</p> <p>24 internal investigation into this case -- into</p> <p>25 the allegations in this case?</p>
35	<p>1 the only thing that I would consider to be an</p> <p>2 office in that area.</p> <p>3 Q. But is there another off-site office space for</p> <p>4 the Carmel Swim Club across the street or</p> <p>5 something?</p> <p>6 A. Yes, it's my understanding the Carmel Swim Club</p> <p>7 rents space or space is provided, I'm not sure</p> <p>8 how that agreement is, in property that is</p> <p>9 owned by Carmel Clay Schools across the street</p> <p>10 from Carmel High School.</p> <p>11 Q. So you don't know if the Carmel Swim Club pays</p> <p>12 rent for that space or not?</p> <p>13 A. I'm not familiar with that agreement. That</p> <p>14 would go through our business office.</p> <p>15 Q. Okay. And do you know if the Carmel Clay</p> <p>16 School Corporation paid to remodel that space</p> <p>17 or if the Swim Club paid for it?</p> <p>18 A. I do not know the answer to that.</p> <p>19 Q. Okay. Have you discussed this case at any</p> <p>20 Carmel Swim Club board meetings?</p> <p>21 A. Not to my recollection.</p> <p>22 MS. SCHNELKER: Hold on one second. Can</p> <p>23 you clarify what you mean by "this case"? This</p> <p>24 present case?</p> <p>25 MR. LITTLE: Sure. The Nieves case.</p>	37	<p>1 A. I do not know.</p> <p>2 Q. Have you spoken to anyone from the Center</p> <p>3 for -- the U.S. Center -- are you -- strike</p> <p>4 that.</p> <p>5 Do you know what the U.S. Center for</p> <p>6 SafeSport is?</p> <p>7 A. I am familiar with the term, yeah.</p> <p>8 Q. Have you spoken to anybody from the U.S. Center</p> <p>9 for SafeSport about this case?</p> <p>10 A. I have not.</p> <p>11 Q. Have you spoken to the U.S. Center for</p> <p>12 SafeSport about any allegations regarding</p> <p>13 Christopher Plumb and any failures in this</p> <p>14 case?</p> <p>15 A. No, I have not.</p> <p>16 Q. Do you know if the Center for SafeSport is</p> <p>17 investigating Mr. Plumb's failures to report in</p> <p>18 this case?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Okay. Have you spoken to Buddy Pylitt about</p> <p>21 this case?</p> <p>22 A. If I did, it was way back in that three-year</p> <p>23 time period, three years ago, but I don't</p> <p>24 recall what that conversation was.</p> <p>25 Q. How about Kris Kazmierczak?</p>

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38	<p>1 A. I'm not familiar with that name.</p> <p>2 Q. Okay. Have you talked to anyone from USA</p> <p>3 Swimming about this case?</p> <p>4 A. No, I have not.</p> <p>5 MR. LITTLE: Can we put up, Gaby, 1807?</p> <p>6 We'll mark it as Exhibit 2.</p> <p>7 (WHEREUPON, Deposition Exhibit 2 was</p> <p>8 marked for identification.)</p> <p>9 MS. OLSHEMSKI: That one?</p> <p>10 MR. LITTLE: 1807.</p> <p>11 MS. OLSHEMSKI: Yeah. It closed out.</p> <p>12 MR. LITTLE: We can come back to it if</p> <p>13 you don't have it up right now.</p> <p>14 MS. OLSHEMSKI: Here we go. Sorry.</p> <p>15 BY MR. LITTLE:</p> <p>16 Q. Okay. Sir, if you could take a look at what's</p> <p>17 on the screen. Who is Roger McMichael?</p> <p>18 A. Mr. McMichael is the associate superintendent</p> <p>19 for business affairs for the school district.</p> <p>20 MR. LITTLE: Okay. Can you scroll down,</p> <p>21 Gaby?</p> <p>22 BY MR. LITTLE:</p> <p>23 Q. Okay. Do you know who Lisa, that Chris Plumb</p> <p>24 is talking about, is?</p> <p>25 A. I would assume Lisa is Lisa Sheets, the office</p>	40	<p>1 A. I would start with my immediate supervisor, the</p> <p>2 principal. And we would have discussion on who</p> <p>3 else we would start speaking with at that time</p> <p>4 as well.</p> <p>5 Q. Okay. And that's what you would have done in</p> <p>6 December 2017?</p> <p>7 A. Yes.</p> <p>8 Q. And then that's what you would do now, too?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 MR. LITTLE: Gaby, can you put up 3906?</p> <p>12 (WHEREUPON, Deposition Exhibit 3 was</p> <p>13 marked for identification.)</p> <p>14 BY MR. LITTLE:</p> <p>15 Q. And this is mainly, sir, just to get this into</p> <p>16 evidence. We already discussed this. I -- can</p> <p>17 you correct me, if I'm wrong, but right here --</p> <p>18 MR. LITTLE: Slow down, Gaby. Go back to</p> <p>19 the time schedule -- or actually, go to the top</p> <p>20 so he can see what it is.</p> <p>21 BY MR. LITTLE:</p> <p>22 Q. Okay. This e-mail from 2018 talking about the</p> <p>23 first swim meet of the season, if you look down</p> <p>24 at the entry for 3:20 to 3:50 p.m., do you see</p> <p>25 that?</p>
39	<p>1 manager for Carmel Swim Club.</p> <p>2 Q. Okay. And do you see the second sentence, "On</p> <p>3 another note" there?</p> <p>4 A. Yes.</p> <p>5 Q. "Does your offer still stand of free rent in</p> <p>6 the space?" Do you know if Carmel is -- the</p> <p>7 Carmel Clay School Corporation did indeed give</p> <p>8 the space to the Carmel Swim Club rent free?</p> <p>9 A. That's not part of my area. I'm not familiar</p> <p>10 with it.</p> <p>11 Q. Okay. All right.</p> <p>12 MR. LITTLE: We take that down, Gaby.</p> <p>13 Thanks.</p> <p>14 MS. OLSHEMSKI: Jon, we can see your</p> <p>15 outline.</p> <p>16 MR. LITTLE: Oh, sorry.</p> <p>17 BY MR. LITTLE:</p> <p>18 Q. Okay. When you -- if you were to receive --</p> <p>19 you, yourself, as athletic director, were to</p> <p>20 receive an allegation of sexual abuse, someone</p> <p>21 says: Hey, Mr. Inskeep, I think so and so...</p> <p>22 and it has to do with sexual abuse, and you</p> <p>23 call CPS, who in your chain of command do you</p> <p>24 report that to? Who do you say, hey, I got</p> <p>25 this allegation of sexual abuse?</p>	41	<p>1 A. Uh-huh.</p> <p>2 Q. It says there's a SafeSport meeting. What is</p> <p>3 that?</p> <p>4 MS. SCHNELKER: Hey, Jon, I'm just going</p> <p>5 to object to the extent that I don't see his</p> <p>6 e-mail address on this. So I'm not sure that</p> <p>7 this witness is the right person to properly</p> <p>8 authenticate it. But you can go ahead and ask</p> <p>9 him if he knows that.</p> <p>10 BY MR. LITTLE:</p> <p>11 Q. Sure. Sir, are you familiar with a SafeSport</p> <p>12 meeting for the Carmel High School swim team?</p> <p>13 A. No. And it looks like on that e-mail, it says</p> <p>14 club swimmers ahead of it.</p> <p>15 Q. Okay. What does that mean to you, club</p> <p>16 swimmers, if you have any opinion?</p> <p>17 MS. SCHNELKER: Objection. Just lack of</p> <p>18 personal knowledge. Go ahead.</p> <p>19 A. My opinion would be that would be swimmers that</p> <p>20 swim for Carmel High School and for the Club.</p> <p>21 But we do have a percentage of student athletes</p> <p>22 that do not swim with the club; they do high</p> <p>23 school only.</p> <p>24 Q. Okay. You -- have you ever seen this SafeSport</p> <p>25 training for the Carmel Swim Club?</p>

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<p style="text-align: right;">42</p> <p>1 A. No, I have not. 2 Q. Okay. If you wanted to get a copy of it, who 3 would you go to for that? 4 A. I would contact Coach Plumb. 5 Q. Do you know if it's a video or written 6 materials or anything about it? 7 A. I do not know. 8 Q. Okay. All right. So turning to December 2017. 9 In December 2017, did Mr. Plumb relay any 10 concerns about Gabriela Nieves possibly being 11 involved in inappropriate text communications 12 with Chris -- with John Goelz? 13 A. No, not to me. 14 Q. Okay. Have you learned -- well, strike that. 15 MR. LITTLE: The let's put up -- Gaby, 16 can you put up the e-mail from Mr. Hahn -- or 17 from Mr. Ranochak to Mr. Plumb, rather. 18 (WHEREUPON, Deposition Exhibit 4 was 19 marked for identification.) 20 BY MR. LITTLE: 21 Q. Okay. Let's mark this as Exhibit 4. Sir, can 22 you take a second and read what's on the screen 23 there? 24 A. Yes, I'm finished. 25 Q. Okay. Have you ever seen that e-mail before?</p>	<p style="text-align: right;">44</p> <p>1 A. I don't know that I have much of a reaction to 2 it other than given that information, it would 3 have been really good to have that conversation 4 with myself. 5 Q. Did you -- in December 2017, if you'd received 6 this information, you would have investigated 7 it, correct? 8 A. Yes. 9 Q. Would you have talked to Gabriela? 10 A. Yes. 11 Q. Would you have notified her parents? 12 A. Yes, sir. 13 Q. Would you have talked to Mr. Goelz? 14 A. Yes, sir. 15 Q. Are you aware -- so you see the date of the 16 e-mail is December 12, 2017. Do you know that 17 Christopher Plumb never spoke to Gabriela 18 Nieves about the concerns related here? 19 MS. SCHNELKER: Objection to the lack of 20 personal knowledge and foundation. You can 21 answer. 22 A. Can you ask the question again? I'm sorry. 23 BY MR. LITTLE: 24 Q. Sure. The date of this e-mail, do you see 25 December -- can you tell me what the date of</p>
<p style="text-align: right;">43</p> <p>1 A. The only time I've seen that e-mail is in 2 preparation for this deposition today. 3 Q. So prior to 2021, you had never seen this 4 e-mail? 5 A. Correct. 6 Q. Okay. And correct me if I'm wrong, but in 7 December 2017, you would have expected a coach 8 to come to you if one of his subordinates 9 was -- or strike that. 10 I believe you testified earlier that in 11 December 2017, you would have expected a coach 12 to come to you if one of his assistant coaches 13 was texting an athlete about boyfriends and 14 parent trouble, correct? 15 A. Yeah, I think it's easy to say at this point, 16 knowing what we know, that we would investigate 17 those text messages. But, you know, I would 18 say given this information, the boyfriends and 19 not swim-related, yes. 20 Q. You would have expected to have been notified 21 about this, correct? 22 A. Yes. 23 Q. Okay. What was your re- -- what's your 24 reaction to this e-mail, seeing it four years 25 lat- -- almost three-plus years later?</p>	<p style="text-align: right;">45</p> <p>1 this e-mail is? 2 A. December 12, 2017. 3 Q. Okay. Do you know that in response to these 4 concerns, Mr. Plumb never spoke to Gabriela 5 Nieves? Did you know that? 6 MS. SCHNELKER: Same objection. 7 A. No. 8 BY MR. LITTLE: 9 Q. Did you know that in response to these 10 concerns, Mr. Plumb never spoke to Ms. Nieves' 11 parents? Did you know that? 12 A. No. 13 Q. In response to these concerns, Mr. Ranochak 14 never spoke to Gabriela Nieves, did you know 15 that? 16 A. No. 17 Q. And Mr. Ranochak never spoke to her parents in 18 response to these concerns, did -- were you 19 aware of that? 20 A. No, sir. 21 Q. But the first time you became aware of any 22 potential inappropriate or illegal activity 23 with Mr. Goelz was in July of 2017 when he was 24 arrested, is that right? 25 A. Yes, I believe that's the date.</p>

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<p style="text-align: right;">46</p> <p>1 Q. All right. Prior to his arrest, had you ever 2 had any -- 3 MS. SCHNELKER: I'm sorry, I'm just going 4 to correct for the record, it was in July of 5 2018. 6 MR. LITTLE: Oh, July 2018. Okay, sorry. 7 I thought that's what I said, but -- 8 MS. SCHNELKER: That's okay. 9 BY MR. LITTLE: 10 Q. All right. Prior to his arrest, had you had 11 any complaints about Mr. Goelz? 12 A. Not to my recollection, no. 13 Q. Do you know who Ronald Hahn is? 14 A. Yes, I do. 15 Q. Okay. Let me ask you this: In response to 16 these -- Mr. Hahn's conversation, if this had 17 been brought to you in December 2017, would you 18 have called Mr. Hahn? 19 A. If I knew that Mr. Hahn was -- I'm sorry, can 20 you say that again? 21 Q. Sure. If Mr. Hahn had come to one of -- well, 22 Mr. Hahn did come to one of your assistant 23 coaches, relay the concerns detailed here in 24 Exhibit 4. If Mr. Plumb had come to you in 25 December of 2017 saying, hey, this is what</p>	<p style="text-align: right;">48</p> <p>1 MS. OLSHEMSKI: Jon, do you mean 3036? 2 MR. LITTLE: No -- yes, yes, 3036. I'm 3 sorry. 4 MS. OLSHEMSKI: Okay. 5 BY MR. LITTLE: 6 Q. Who is -- 7 MS. SCHNELKER: Let me have one second 8 just to read through. 9 MR. LITTLE: Sure. Yeah. 10 MS. SCHNELKER: Okay. Sorry, Jon. Go 11 ahead if the witness is ready. 12 BY MR. LITTLE: 13 Q. Sir, have you had a second -- yeah. Who's 14 [REDACTED] 15 A. [REDACTED] was a student athlete within our 16 program that has since graduated. 17 Q. Why is he -- why did he get banned from USA 18 Swimming, if you know? 19 A. I don't recall the specifics of that, but it 20 was something while he was a juvenile with 21 another student. 22 Q. Of a sexual nature? 23 A. That's my recollection, yes. 24 Q. Okay. Was he banned from Carmel High School 25 Swimming?</p>
<p style="text-align: right;">47</p> <p>1 Ronald Hahn apparently told Jon Ranochak, would 2 you have called Mr. Hahn? 3 A. No. 4 Q. Why not? 5 A. I would have contacted Gabriela's parents. 6 Q. Okay. 7 A. I don't -- I don't deal much with hearsay and 8 third-party stuff. I'd go straight to the 9 family. 10 Q. Good. Would you have notified your principal? 11 A. Yes. 12 Q. And you would have documented that notification 13 with a writing somehow, an e-mail or something? 14 A. It depends. You know, sometimes it's just 15 matter of what's the easiest way to get ahold 16 of that individual. 17 Q. Okay. Has any disciplinary action been taken 18 against Mr. Plumb or Mr. Ranochak in response 19 to not bringing these allegations to your 20 attention in December of 2017? 21 A. No, sir. 22 MR. LITTLE: Okay. All right. Let's 23 move on to 3306. 24 (WHEREUPON, Deposition Exhibit 5 was 25 marked for identification.)</p>	<p style="text-align: right;">49</p> <p>1 A. No, he was not. 2 Q. Why not? 3 A. At that time, my recollection was we did not 4 have any basis to be able to withhold him from 5 that extracurricular. 6 Q. Was it -- I mean, do you remember anything 7 about the allegation? 8 A. I really do not. I'm sorry. 9 MR. LITTLE: Okay. Can we see 2202? So 10 mark that one as Exhibit 5, I'm sorry. 11 MS. OLSHEMSKI: Yes, I got it. 12 (WHEREUPON, Deposition Exhibit 5 was 13 marked for identification.) 14 BY MR. LITTLE: 15 Q. Okay. All right. 2202. Who is [REDACTED]? 16 A. I know that is the last name of a student 17 athlete that was in our program. I think male 18 and female, they had both in the swimming and 19 diving program. 20 Q. Was there any allegations of sexual misconduct 21 or harassment involving the [REDACTED]? 22 A. If there was, I don't recall. One was a -- 23 one was a girl diver and the boy -- I'm not 24 sure. Nothing that's striking a chord right 25 now.</p>

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50	<p>1 Q. Okay. Were they -- were either of the [REDACTED] 2 ever removed from the swimming program? 3 A. I don't think the girl was. But I seem to 4 recall there might have been something with 5 attendance or behavior with the boy. 6 Q. But nothing like a rape or anything? 7 A. Not -- no, nothing to that level that I can 8 remember, no. 9 MR. LITTLE: Gaby, can you put up 2075? 10 We'll mark this as Exhibit 6. 11 (WHEREUPON, Deposition Exhibit 6 was 12 marked for identification.) 13 MS. SCHNELKER: I'm sorry, I thought 2202 14 was Exhibit 6. 15 MS. OLSHEMSKI: Yeah, 2175 is going to be 16 Exhibit 7. 17 MR. LITTLE: All right. Thank you. 18 (WHEREUPON, Deposition Exhibit 7 was 19 marked for identification.) 20 MS. SCHNELKER: I'll just note that 21 Exhibit 6 and Exhibit 7, neither of them 22 involve Mr. Inskeep's e-mails that I can see. 23 You can answer the questions. 24 BY MR. LITTLE: 25 Q. I'm just -- do you have any -- does this -- do</p>	52	<p>1 A. Sharon Eskew. 2 Q. Okay. And there's a swim coach in there, Ray 3 Lawrence, correct? 4 A. Yes. 5 Q. Okay. And the Carmel girls swim team started 6 in 1979, right? 7 A. That sounds about right. 8 Q. And they've won every girls State Championship 9 since, correct? 10 A. No, sir. 11 Q. Which one did they not win? 12 A. That streak started in 1986. 13 Q. Oh, okay. So they didn't win consecutively 14 from '79 to '86? 15 A. Correct. 16 Q. Okay. They've won every one since 1986, then, 17 is that right? 18 A. Yes. 19 Q. Okay. And Ray Lawrence was the coach when that 20 started, correct? 21 A. Yes, sir. 22 Q. Now, you know Ray Lawrence is banned for life 23 from United States Swimming, correct? 24 A. That is my understanding, yes. 25 Q. Okay. When did you become aware of that fact?</p>
51	<p>1 you have any recollection about what was going 2 on here with [REDACTED], maybe, or [REDACTED] 3 [REDACTED]? 4 A. Connor is -- Connor is Connor Bradley, who was 5 a member of the staff at that time and a 6 teacher in our building. So it's Connor 7 Bradley and [REDACTED]. 8 Q. Okay. Any idea what's going on here? 9 A. Nothing that -- nothing that is jogging my 10 memory, no. 11 Q. Okay. Let's turn towards other Carmel coaches. 12 Do you know -- Carmel maintains an athletic 13 Hall of Fame, correct? 14 A. Yes. 15 Q. Okay. What coaches are in the Carmel Athletic 16 Hall of Fame? 17 A. I'd have to go ahead and look that up to see 18 the complete list of them. 19 Q. Okay. So Chuck Koeppen from cross country is 20 in the Carmel Athletic Hall of Fame? 21 A. Yes, sir. 22 Q. Okay. I think there was a basketball coach, a 23 woman's basketball coach in there? 24 A. Yes. 25 Q. What's her name, if you remember?</p>	53	<p>1 A. When that became public information. 2 Q. Which was about 2010? 3 A. That sounds about right, in and around that 4 time period. 5 Q. Okay. But how did you become aware of that, if 6 you remember? 7 A. My recollection was that his name was added to 8 the list. I can't remember if I was notified 9 at that time. It's been 11 years ago. But I 10 became aware that he was on the list but did 11 not receive any information further than that. 12 Q. And do you know why Mr. Lawrence was banned? 13 A. No, I do not. 14 Q. It's -- do you know -- you don't know that it's 15 for raping the children he coached? 16 A. No, I do not have that information. 17 Q. Are you aware of any Carmel students raped by 18 Mr. Lawrence while he was teaching English and 19 coaching girls swimming at Carmel High School? 20 A. No. 21 Q. Have you ever spoken to any students who 22 claimed they were raped by Ray Lawrence while 23 he was teaching English and coaching girls 24 swimming at Carmel High School? 25 A. No, I have not.</p>

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54	<p>1 Q. Why is he still in the athletic hall of fame?</p> <p>2 MS. SCHNELKER: Objection, lack of</p> <p>3 foundation. You can answer.</p> <p>4 A. Sure. We have not removed anyone's pictures</p> <p>5 from the Hall of Fame.</p> <p>6 BY MR. LITTLE:</p> <p>7 Q. Now, who decides who gets into the Carmel High</p> <p>8 School Hall of Fame?</p> <p>9 A. It was a collective conversation in my time</p> <p>10 period, which was established before I started,</p> <p>11 the athletic director, assistant athletic</p> <p>12 director, any other various administrators we</p> <p>13 would pull in, including the principal.</p> <p>14 Q. Okay. So from -- in -- who was the athletic</p> <p>15 director of Carmel high school while</p> <p>16 Mr. Lawrence was coaching girls swimming?</p> <p>17 A. That would have been William Shepherd.</p> <p>18 Q. Okay. When did Mr. Lonso start coaching -- or</p> <p>19 become the athletic director?</p> <p>20 A. In the fall of 1992.</p> <p>21 Q. Okay. Is Mr. Shepherd still alive?</p> <p>22 A. He is not.</p> <p>23 Q. Have you ever spoken to Ray Lawrence?</p> <p>24 A. Not about this. I know Ray Lawrence just from</p> <p>25 him being a coach and an administrator at</p>	56	<p>1 time period.</p> <p>2 Q. I thought you started in '97?</p> <p>3 A. No, I did not.</p> <p>4 Q. When did you start as a -- being employed from</p> <p>5 the Carmel School District?</p> <p>6 A. I started employment in '97, but I was not the</p> <p>7 athletic director.</p> <p>8 Q. What was your job in '97?</p> <p>9 A. Teaching sixth grade reading.</p> <p>10 Q. Okay. And then what was your job in 1998?</p> <p>11 A. Sixth grade social studies.</p> <p>12 Q. 1999?</p> <p>13 A. I would have been seventh grade social studies.</p> <p>14 Q. 2000.</p> <p>15 A. '99-2000, I would have been seventh grade</p> <p>16 social studies at Carmel Junior High.</p> <p>17 Q. Okay. 2001?</p> <p>18 A. Carmel High School.</p> <p>19 Q. Okay. So was Ray Lawrence a Carmel High School</p> <p>20 coach in 2001 -- or not Ray Lawrence, strike</p> <p>21 that. Richard Rice?</p> <p>22 A. Not to my recollection. I believe he had</p> <p>23 stepped away from coaching maybe the year</p> <p>24 before.</p> <p>25 Q. Did you know Mr. Rice?</p>
55	<p>1 Speedway schools. But, no, nothing more than</p> <p>2 hi.</p> <p>3 Q. When was last time you spoke to Mr. Lawrence?</p> <p>4 A. I do not recall, but I have not seen him since</p> <p>5 the time of the -- of that USA Swimming</p> <p>6 notification.</p> <p>7 Q. Okay. Do you know if the Carmel schools have</p> <p>8 paid money to any of the students that</p> <p>9 Mr. Lawrence raped?</p> <p>10 A. Not to my recollection. I do not know.</p> <p>11 Q. Do you know why Mr. Lawrence was removed as the</p> <p>12 girls swim coach from Carmel High School?</p> <p>13 A. No, I have no knowledge of that.</p> <p>14 Q. Do you know that when he was removed as girls</p> <p>15 swim coach, he still coached the boys? Did you</p> <p>16 know that?</p> <p>17 A. That's my understanding on the timeline, yes.</p> <p>18 Q. Do you have any idea why Mr. Lawrence left the</p> <p>19 Carmel Clay School system?</p> <p>20 A. No, I do not.</p> <p>21 Q. Do you know a coach named Richard Rice?</p> <p>22 A. Yes, I'm familiar with that name.</p> <p>23 Q. Mr. Rice was a former Carmel High School swim</p> <p>24 coach, correct?</p> <p>25 A. Yes. He was a member of the staff predating my</p>	57	<p>1 A. No, only that he was a member of the teaching</p> <p>2 staff here at the school at the time and had</p> <p>3 previously served on the Swim Club staff.</p> <p>4 Q. And --</p> <p>5 A. The high school staff, I mean.</p> <p>6 Q. Who was the athletic director, then, in</p> <p>7 2001-2002 school year?</p> <p>8 A. I was the athletic director. That was my first</p> <p>9 year.</p> <p>10 Q. Okay. Let's talk about Mr. Rice. Mr. Rice was</p> <p>11 charged criminally for raping his swimmers,</p> <p>12 correct?</p> <p>13 A. My understanding, yes, he was going to be</p> <p>14 charged with one student athlete who had been</p> <p>15 a -- not -- I don't know if it was a student</p> <p>16 athlete or a student in his class. I'm not</p> <p>17 sure that individual was part of the swim team.</p> <p>18 But was certainly a class member of his</p> <p>19 teaching math.</p> <p>20 Q. And Mr. Rice committed suicide, correct?</p> <p>21 A. Yes, shortly after the allegations were made</p> <p>22 public.</p> <p>23 Q. Okay. Have you spoken to the victim of</p> <p>24 Mr. Rice?</p> <p>25 A. No.</p>

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<p style="text-align: right;">58</p> <p>1 Q. Do you know if the Carmel School Corporation 2 paid her any money? 3 A. Not to my knowledge. 4 Q. Was her -- was her name [REDACTED], by chance? 5 A. I do not know what the name was. 6 Q. Okay. Besides Mr. Lawrence, Mr. Goelz, and 7 Mr. Rice, are you aware of any other Carmel 8 Swim Club -- or strike that -- Carmel High 9 School swim coaches who have had sex with their 10 athletes? 11 MS. SCHNELKER: I'm going to object just 12 to the extent that he testified that he wasn't 13 aware of any inappropriate relationships 14 concerning Ray Lawrence. But you can answer. 15 A. No. 16 BY MR. LITTLE: 17 Q. Okay. Now, are you aware of any other Carmel 18 High School swim coaches who have been charged 19 with criminal conduct involving not reporting 20 sexual abuse of their athletes? 21 A. Not to my understanding. 22 Q. Do you know Tony Young? 23 A. Yes, I do. 24 Q. Okay. How do you know Mr. Young? 25 A. He currently works with Indiana Swimming. He</p>	<p style="text-align: right;">60</p> <p>1 the record that the Carmel Clay School 2 Corporation has marked an Indy Star article as 3 confidential. 4 MS. SCHNELKER: Hey, Jon, I'm just going 5 to respond to that. This entire file has been 6 marked as confidential because it concerns the 7 materials of a former employee. 8 MR. LITTLE: Well, I am going to take up 9 the designation of an Indy Star article as 10 confidential. I think that you need to be 11 judicious in your marking of documents as 12 confidential. 13 BY MR. LITTLE: 14 Q. All right. Did you ever speak to Mr. Young 15 about the allegations that he failed to report 16 the sodomy of one of his athletes? 17 A. No, I have not. 18 Q. Okay. Do you know if any disciplinary action 19 was taken against Mr. Young for failing to 20 report the sodomy of one of his athletes? 21 A. Just what I see in the article here from 22 Hamilton County. But, no, I was not -- no 23 firsthand knowledge of that. 24 Q. Okay. Did -- was Mr. Young ever a swim coach 25 while you were athletic director?</p>
<p style="text-align: right;">59</p> <p>1 was a former swim coach at Carmel High School 2 before my time. 3 Q. Okay. Do you know if Mr. Young was ever 4 charged criminally for failing to report sexual 5 misconduct against a swimmer? 6 A. I have seen that information, but I was not a 7 party to that. 8 MR. LITTLE: Okay. Gaby, can you put 9 that on the screen? 10 (WHEREUPON, Deposition Exhibit 8 was 11 marked for identification.) 12 MR. LITTLE: Put up Indy Star, the 6591, 13 please. While she's getting that -- 14 MS. OLSHEMSKI: Is that the newspaper 15 clipping? 16 MR. LITTLE: Yes, yes. Yes, Gaby. Yep. 17 Okay, perfect. Can you -- can you rotate it, 18 maybe? 19 MS. OLSHEMSKI: It's not -- sorry. 20 THE WITNESS: I can -- I can see that if 21 it's all right. 22 MR. LITTLE: Okay. All right. Well, can 23 you possibly get the date on there, Gaby? 24 MS. OLSHEMSKI: Yeah. 25 MR. LITTLE: I'd just like to note for</p>	<p style="text-align: right;">61</p> <p>1 A. No, sir. 2 Q. Okay. Did you -- do you know if the Carmel 3 Clay School Corporation wrote Mr. Young any 4 letters of recommendation for other employment? 5 A. I do not know the answer to that. 6 Q. Have you written Mr. Young any letters of 7 recommendation for other employment? 8 A. No, I have not. 9 MR. LITTLE: Okay. Let's -- you can take 10 that down. 11 BY MR. LITTLE: 12 Q. How did you become aware of the allegations 13 that Mr. Young had failed to report sexual 14 misconduct? 15 A. I subscribed to the Indianapolis Star at that 16 time. 17 Q. Okay. So that's -- you -- first time you read 18 about it was in the newspaper? 19 A. Yes, sir. 20 Q. Do you know anything about those allegations? 21 A. Just what I read in the paper. 22 Q. You have no independent knowledge of the 23 substance of those allegations? 24 A. No. 25 Q. Okay. So the swim coach, when you became</p>

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62	<p>1 athletic director, was Ken Stopkotte, correct?</p> <p>2 A. Yes, he was hired in 2000-2001.</p> <p>3 Q. Okay. And why was -- how long did</p> <p>4 Mr. Stopkotte serve as Carmel swim coach?</p> <p>5 A. Three years, I believe.</p> <p>6 Q. Okay. And why did he leave the Carmel Clay</p> <p>7 School Corporation?</p> <p>8 A. Mr. Stopkotte had a falling out with the Carmel</p> <p>9 Swim Club board over some receipts and not</p> <p>10 having authorization to use expenditures, and</p> <p>11 it was kind of a larger part of a, for lack of</p> <p>12 a better term, not a lot of confidence in his</p> <p>13 leadership. So that was with the Swim Club.</p> <p>14 And as that became knowledge to the Carmel High</p> <p>15 School, he resigned or was fired from Carmel</p> <p>16 Swim Club but was still the Carmel High School</p> <p>17 coach at that time period for a period of a</p> <p>18 month or two while we tried to sort things out.</p> <p>19 And then Mr. Stopkotte resigned from our</p> <p>20 position as well.</p> <p>21 Q. Okay. Now, where did he go after that?</p> <p>22 A. Now, I believe Mr. Stopkotte may have left the</p> <p>23 state at that point. I'm not real clear on his</p> <p>24 whole timeline.</p> <p>25 Q. Did he -- he went to Fishers.</p>	64	<p>1 Banned from Indiana Swimming, you're aware of</p> <p>2 that?</p> <p>3 A. That's my recollection, that there was several</p> <p>4 things that led into that because of his</p> <p>5 criminal cases.</p> <p>6 Q. And he -- and he was charged criminally in</p> <p>7 Hamilton County, correct?</p> <p>8 A. I believe so.</p> <p>9 Q. And he was exonerated, correct?</p> <p>10 A. But I don't -- but I'm not for certain on that.</p> <p>11 I think there was something at Fishers High</p> <p>12 School. But, again, only what I read in the</p> <p>13 Indianapolis Star.</p> <p>14 Q. Okay. When was the last time you spoke to</p> <p>15 Mr. Stopkotte?</p> <p>16 A. I do not recall, but it's been a long time ago.</p> <p>17 Q. Okay. Have you ever --</p> <p>18 A. Like maybe ten years.</p> <p>19 Q. Have you ever spoken to Buddy Pylitt about</p> <p>20 Mr. Stopkotte?</p> <p>21 A. Yes, I'm fairly certain I did.</p> <p>22 Q. When was that conversation?</p> <p>23 A. Mr. Pylitt and I have spoken about</p> <p>24 Mr. Stopkotte along the way in terms of other</p> <p>25 situations that have come up with him.</p>
63	<p>1 A. I do know he spent time in Tennessee. May have</p> <p>2 gone back to Ohio. At some point he returned</p> <p>3 to Fishers High School as their swim coach.</p> <p>4 Q. Okay. So, and he was at Fishers and he</p> <p>5 ultimately -- are you aware of Mr. Stopkotte</p> <p>6 appearing on 20/20, the news program 20/20?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. What did Mr. Stopkotte go on 20/20</p> <p>9 about, if you remember?</p> <p>10 A. My recollection is that Mr. Stopkotte spoke to</p> <p>11 sexual abuse within USA Swimming, and that's</p> <p>12 kind of the summary of it.</p> <p>13 Q. He said it was a problem in United States</p> <p>14 Swimming, correct?</p> <p>15 A. That's my recollection, yes.</p> <p>16 Q. Okay. And then shortly thereafter, he was</p> <p>17 terminated by USA -- he was banned for life by</p> <p>18 USA Swimming. Are you aware of that?</p> <p>19 A. I am not aware of the timing of all that, no.</p> <p>20 Q. Okay. But you're aware --</p> <p>21 A. I do know that he had other things that led to</p> <p>22 his time in prison.</p> <p>23 Q. Right. That's -- I'm coming up to that.</p> <p>24 A. Okay.</p> <p>25 Q. So he was banned from United States Swimming.</p>	65	<p>1 Q. Like what?</p> <p>2 A. As he has been arrested and has been indicted.</p> <p>3 I believe he was extradited at one time as</p> <p>4 well.</p> <p>5 Q. And those were for drug offenses, correct, for</p> <p>6 cocaine, stealing from churches to get money to</p> <p>7 buy cocaine?</p> <p>8 A. I do not know the specifics of it. I know he's</p> <p>9 had a lot of things that have not gone very</p> <p>10 well.</p> <p>11 Q. All right. So how often do you talk to Buddy</p> <p>12 Pylitt?</p> <p>13 A. About once a year.</p> <p>14 Q. And was this text message recently is about --</p> <p>15 is that your typical once-a-year contact with</p> <p>16 Mr. Pylitt?</p> <p>17 A. Yes, sir.</p> <p>18 Q. How many conversations do you believe you had</p> <p>19 with Mr. Pylitt concerning Mr. Stopkotte?</p> <p>20 A. I can't put a number on that, but I wouldn't</p> <p>21 say numerous. I would say a few.</p> <p>22 Q. Less than a dozen?</p> <p>23 A. Yes, likely.</p> <p>24 Q. Are you aware of any other Carmel coaches that</p> <p>25 have been charged criminally for sexual</p>

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66	<p>1 misconduct with a minor or failing to report</p> <p>2 sexual activity with a minor besides the</p> <p>3 coaches we've discussed?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. Yes.</p> <p>7 Q. Go ahead. And who are they?</p> <p>8 A. Sure. At the time of my hire as the athletic</p> <p>9 director in July of 2001, we had three arrests</p> <p>10 for coaches/teachers that had relationships</p> <p>11 with students, and that was all within a</p> <p>12 two-month or so time period.</p> <p>13 So the one you referenced earlier,</p> <p>14 Richard Rice, was, I believe, the third of</p> <p>15 those.</p> <p>16 Also at that time period was the girls</p> <p>17 basketball head coach, Don Renihan, with a</p> <p>18 student athlete under his direction that had</p> <p>19 followed him from school to school. Actually</p> <p>20 from other schools to our school upon his</p> <p>21 hiring before my hire in the athletic office.</p> <p>22 And then also a Rick Doucette. And Rick</p> <p>23 Doucette was a freshman boys soccer coach</p> <p>24 caught in the parking lot giving or receiving</p> <p>25 oral sex with a 15-year-old student athlete.</p>	68	<p>1 A. Correct, that's my recollection.</p> <p>2 Q. Okay. And as far as you know, Carmel has not</p> <p>3 paid any settlements or monies to any victims</p> <p>4 of alleged sexual improprieties between Carmel</p> <p>5 coaches and students after Mr. Trisler and</p> <p>6 before Mr. Goelz?</p> <p>7 A. I'm not familiar with any of those. I'm not a</p> <p>8 party to that.</p> <p>9 Q. Who would be most familiar with -- if there</p> <p>10 were any, who would be most familiar with them?</p> <p>11 A. That would need to come from our</p> <p>12 superintendent's office and any records that</p> <p>13 are kept there.</p> <p>14 Q. And who is the superintendent now?</p> <p>15 A. The current superintendent is Dr. Michael</p> <p>16 Beresford.</p> <p>17 Q. And when did he start?</p> <p>18 A. I believe he has been here three and a half</p> <p>19 years now, two or -- his first month on the job</p> <p>20 was at the time of Mr. Goelz's arrest. So</p> <p>21 starting in the fall of 2017.</p> <p>22 Q. And who was his predecessor?</p> <p>23 A. I'm sorry, I'm sorry, I'm wrong on that. The</p> <p>24 fall of 2018.</p> <p>25 Q. Okay.</p>
67	<p>1 Q. Okay. And then after those coaches, then you</p> <p>2 had some kind of -- you terminated Josh Trisler</p> <p>3 for this sports bra incident?</p> <p>4 A. Yes, that's my recollection.</p> <p>5 Q. Okay. After that, do you -- are you aware of</p> <p>6 any other coaches that you -- that have been</p> <p>7 accused of sexual -- not accused. Are you</p> <p>8 aware of any other coaches that have been</p> <p>9 arrested for sexual impropriety with Carmel</p> <p>10 students?</p> <p>11 A. No.</p> <p>12 Q. Are you aware of any other coaches that have</p> <p>13 been arrested for sexual impropriety with any</p> <p>14 children?</p> <p>15 A. No.</p> <p>16 Q. Are you aware of any other coaches who have</p> <p>17 been arrested -- or not arrested, but who have</p> <p>18 been terminated by the Carmel School</p> <p>19 Corporation for sexual inappropriate contacts</p> <p>20 with students?</p> <p>21 A. No.</p> <p>22 Q. So your testimony is between Mr. Trisler and</p> <p>23 Mr. Goelz, no other Carmel coaches have been</p> <p>24 terminated for sexual impropriety with</p> <p>25 students?</p>	69	<p>1 A. Yeah, I'm sorry.</p> <p>2 Q. Yeah, after Mr. Goelz's arrest, okay.</p> <p>3 A. Yes.</p> <p>4 Q. Who was his predecessor?</p> <p>5 A. Well, we went through an interim year of</p> <p>6 co-superintendents, which was Amy Dudley and</p> <p>7 Roger McMichael, and then prior to that was</p> <p>8 Nicholas Wahl.</p> <p>9 Q. And why did Mr. Wahl leave Carmel?</p> <p>10 A. Nicholas Wahl was deemed unfit for the position</p> <p>11 by the school board because of his relationship</p> <p>12 with the human resource director that he had</p> <p>13 hired.</p> <p>14 Q. He was having a sexual relationship with the</p> <p>15 human resource director, correct?</p> <p>16 A. That's my understanding.</p> <p>17 Q. And when did Mr. Wahl start as the Carmel</p> <p>18 superintendent?</p> <p>19 A. I believe around four years, maybe. I could be</p> <p>20 off by a year. Four to five.</p> <p>21 Q. So that's about 2010?</p> <p>22 A. No, he was not in 2010. So it would have been</p> <p>23 around 2013-ish, 2014.</p> <p>24 Q. Okay. Who was his predecessor?</p> <p>25 A. Jeff Swenson was the superintendent before</p>

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70	<p>1 that.</p> <p>2 Q. And how long was Mr. Swenson superintendent?</p> <p>3 A. About a three to four time -- three- to</p> <p>4 four-year time period.</p> <p>5 Q. Okay. And who was his predecessor?</p> <p>6 A. This is tough.</p> <p>7 MS. SCHNELKER: You didn't know you were</p> <p>8 going to get quizzed, huh?</p> <p>9 A. Yeah. Barbara Underwood was his predecessor</p> <p>10 for a period of about six -- about seven years.</p> <p>11 BY MR. LITTLE:</p> <p>12 Q. Okay. And that's -- and then was she who was</p> <p>13 superintendent when you were hired?</p> <p>14 A. Yes, I believe so.</p> <p>15 Q. Okay.</p> <p>16 A. No, sorry. Ernie Husrick (phonetic) was the</p> <p>17 superintendent for one year from 2000 to 2001.</p> <p>18 And at the time of my hire, Mr. Husrick was</p> <p>19 never -- was not superintendent, and I don't</p> <p>20 know that one had been named yet at that time.</p> <p>21 Q. Okay. Now, have there been -- there have been</p> <p>22 incidences of kid-on-kid sexual misconduct in</p> <p>23 the Carmel School Corporation between 2002 and</p> <p>24 2018, correct?</p> <p>25 A. Yes, sir.</p>	72	<p>1 Q. Okay. What other incidences are you aware of</p> <p>2 that resulted in lawsuits?</p> <p>3 A. That's the one that sticks out most to me. I'm</p> <p>4 sure there are others, but that's the one that</p> <p>5 I have the most recollection of.</p> <p>6 Q. Okay. If I wanted to get a list of all the</p> <p>7 settlements that the Carmel School Corporation</p> <p>8 has been a party to from 2002 to 2018, who</p> <p>9 should I ask for that?</p> <p>10 A. I would contact the superintendent's office.</p> <p>11 MR. LITTLE: Okay. Let's take a -- about</p> <p>12 a five-minute break. I'm almost done.</p> <p>13 THE VIDEOGRAPHER: Okay. This is the</p> <p>14 videographer. We're going off the record at</p> <p>15 11:15.</p> <p>16 (WHEREUPON, at this time a brief recess</p> <p>17 was taken.)</p> <p>18 THE VIDEOGRAPHER: This is the</p> <p>19 videographer. We're going back on the record.</p> <p>20 It is 11:21.</p> <p>21 BY MR. LITTLE:</p> <p>22 Q. Sir, when you were teaching sixth and seventh</p> <p>23 grade reading, did you coach any sports?</p> <p>24 A. Yes, I coached at Carmel Junior High.</p> <p>25 Q. Okay. And what sports?</p>
71	<p>1 MS. SCHNELKER: I'm just going to show a</p> <p>2 running objection to relevance. But you can go</p> <p>3 ahead and ask.</p> <p>4 BY MR. LITTLE:</p> <p>5 Q. Okay. Now, have any of those resulted in</p> <p>6 lawsuits?</p> <p>7 A. Yes, I'm sure they have.</p> <p>8 Q. Okay. So let's go through. Which ones do you</p> <p>9 know have resulted in lawsuits?</p> <p>10 A. The one that's most sticking out in my mind was</p> <p>11 2010-ish school year, which would have been</p> <p>12 resulting from our boys basketball program.</p> <p>13 Q. Okay. And there was a -- there was a</p> <p>14 lawsuit -- that was where they -- the</p> <p>15 basketball players allegedly put a pencil in</p> <p>16 a -- in the manager's butt and perforated his</p> <p>17 colon?</p> <p>18 A. I think there's evidence to the contrary, but</p> <p>19 there's a lot of information that would be some</p> <p>20 sort of skin-to-skin contact there between</p> <p>21 student athletes.</p> <p>22 Q. Okay. And was there a settlement in that case?</p> <p>23 A. If there was, I'm not aware of it.</p> <p>24 Q. Were you deposed in that case?</p> <p>25 A. No, I was not.</p>	73	<p>1 A. I coached football in the fall and basketball</p> <p>2 in the winter.</p> <p>3 Q. Okay. And when was the last time you were a</p> <p>4 coach?</p> <p>5 A. For the school district, would have been in the</p> <p>6 1999-2000 year. Since that time period, I've</p> <p>7 coached about 25 different teams with my own</p> <p>8 children.</p> <p>9 Q. And in what kind of sports?</p> <p>10 A. Well, baseball, basketball.</p> <p>11 Q. Okay. Let's go one at a time.</p> <p>12 A. Soccer.</p> <p>13 Q. Let's slow down. Let's go back to baseball.</p> <p>14 In baseball, was it Little League?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. And did you receive SafeSport training</p> <p>17 as part of your Little League coaching</p> <p>18 responsibilities?</p> <p>19 A. No, I did not at that time.</p> <p>20 Q. Okay. Okay, keep going.</p> <p>21 A. Basketball.</p> <p>22 Q. Okay. In what organization?</p> <p>23 A. Carmel Dads' Club.</p> <p>24 Q. Okay. Did the Carmel Dads' Club provide any</p> <p>25 SafeSport training?</p>

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74	<p>1 A. Not to my recollection.</p> <p>2 Q. Okay. Keep going.</p> <p>3 A. Let's see. I talked about baseball. Soccer.</p> <p>4 Q. Was that with USA Soccer?</p> <p>5 A. No, it was not. Carmel Dads' Club.</p> <p>6 Q. Okay. And when you coached soccer, did they</p> <p>7 provide any SafeSport training?</p> <p>8 A. No.</p> <p>9 Q. When was the last time you coached youth</p> <p>10 sports?</p> <p>11 A. It would have been four years ago.</p> <p>12 Q. Okay. And what sport was that?</p> <p>13 A. Basketball.</p> <p>14 Q. And who was the organization that you coached</p> <p>15 with?</p> <p>16 A. Through the Carmel Dads' Club.</p> <p>17 Q. Did they provide SafeSport training at that</p> <p>18 time?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Okay. All right. Turning toward Ray Lawrence,</p> <p>21 you could -- could you remove Ray Lawrence from</p> <p>22 the Carmel Hall of Fame?</p> <p>23 A. Yes, we could do that.</p> <p>24 Q. Okay. And is that something you guys are</p> <p>25 considering doing?</p>	76	<p>1 only three coaches in there. He was one of</p> <p>2 them. Do you think that's a good example for</p> <p>3 the kids?</p> <p>4 A. I don't think his position up on the wall is</p> <p>5 one that is looked at by our kids. I will say</p> <p>6 that, you know, throughout the course of all</p> <p>7 the pictures that are in our school, there are</p> <p>8 various coaches that been removed from</p> <p>9 positions for a variety of reasons, and student</p> <p>10 athletes who have gone on to have</p> <p>11 transgressions past their high school years,</p> <p>12 that are still up on the walls and those have</p> <p>13 not been removed.</p> <p>14 Q. Okay. You've been an athletic director in</p> <p>15 Indiana now for al- -- 20 years, right?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. You talk to athletic directors from</p> <p>18 other high schools, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Other large high schools, correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Do you know of any high school in</p> <p>23 Indiana that has had three swim coaches</p> <p>24 convicted of having sex with their children?</p> <p>25 MS. SCHNELKER: Objection to the</p>
75	<p>1 A. We have not had a recent conversation about it.</p> <p>2 But that is something that we could do.</p> <p>3 Q. Do you think it's appropriate that Mr. Lawrence</p> <p>4 is in the Carmel Athletic Hall of Fame given</p> <p>5 him being banned for life from USA Swimming for</p> <p>6 having sex with a child?</p> <p>7 MS. SCHNELKER: Objection to the</p> <p>8 characterization. You can go ahead and answer.</p> <p>9 A. I don't know that I'm ready to answer that</p> <p>10 question, honestly. I think there -- the</p> <p>11 accomplishments as a coach have been what's</p> <p>12 been up on the wall and not the personal</p> <p>13 background of those coaches.</p> <p>14 BY MR. LITTLE:</p> <p>15 Q. Okay. But, I mean, at some point, the cost of</p> <p>16 winning is not worth it, right?</p> <p>17 A. Absolutely. Absolutely, it's not worth it.</p> <p>18 Q. Do you think that sets a good example for Ray</p> <p>19 Lawrence to still be in the Carmel Hall of Fame</p> <p>20 given his public ban from United States</p> <p>21 swimming for sexual misconduct with a minor?</p> <p>22 A. I can't speak to how he thinks about it.</p> <p>23 Q. No, no, no, I meant for the -- for the students</p> <p>24 at your high school, when they look up at the</p> <p>25 high school Hall of Fame, I believe there's</p>	77	<p>1 characterization.</p> <p>2 MR. LITTLE: Yeah, I want to make sure</p> <p>3 you answer that question correctly.</p> <p>4 BY MR. LITTLE:</p> <p>5 Q. Okay. Do you know of any -- of any other high</p> <p>6 school in Indiana that has had three swim</p> <p>7 coaches found to have engaged in sexual conduct</p> <p>8 with their students?</p> <p>9 MS. SCHNELKER: Same objection.</p> <p>10 A. No, but I've also not been tracking that data.</p> <p>11 BY MR. LITTLE:</p> <p>12 Q. Do you know of any other high school that's had</p> <p>13 two?</p> <p>14 A. No, but I've not been tracking that data.</p> <p>15 Q. Okay. Do you know of any other high school</p> <p>16 that's had a swim coach arrested for failing to</p> <p>17 report sexual misconduct?</p> <p>18 A. No.</p> <p>19 MR. LITTLE: Okay. I don't have any</p> <p>20 further questions.</p> <p>21 MS. SCHNELKER: I don't have anything for</p> <p>22 you. That's it. We're going to review and</p> <p>23 sign.</p> <p>24 MR. LITTLE: Okay.</p> <p>25 THE VIDEOGRAPHER: This is the</p>

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<div style="text-align: right;">78</div> <div style="margin-top: 10px;"> 1 videographer. This will mark the end of Media 2 2 and the deposition of Jim Inskeep. We're 3 going off the record at 11:26. 4 5 (Deposition concluded at 11:26 a m.) 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 </div>	<div style="text-align: right;">80</div> <div style="margin-top: 10px;"> 1 PAGE LINE CHANGE 2 3 4 REASON: _____ 5 6 REASON: _____ 7 8 REASON: _____ 9 10 REASON: _____ 11 12 REASON: _____ 13 14 REASON: _____ 15 16 REASON: _____ 17 18 REASON: _____ 19 20 REASON: _____ 21 22 23 JIM INSKEEP 24 _____ 25 (Sign here if changes made.) </div>
<div style="text-align: right;">79</div> <div style="margin-top: 10px;"> 1 2 - - - - - 3 E R R A T A 4 - - - - - 5 6 PAGE LINE CHANGE 7 8 REASON: _____ 9 10 REASON: _____ 11 12 REASON: _____ 13 14 REASON: _____ 15 16 REASON: _____ 17 18 REASON: _____ 19 20 REASON: _____ 21 22 REASON: _____ 23 24 REASON: _____ 25 </div>	<div style="text-align: right;">81</div> <div style="margin-top: 10px;"> 1 ACKNOWLEDGMENT OF DEPONENT 2 3 I, JIM INSKEEP, do 4 hereby certify that I have read the 5 foregoing pages, and that the same is 6 a correct transcription of the answers 7 given by me to the questions therein 8 propounded, except for the corrections or 9 changes in form or substance, if any, 10 noted in the attached Errata Sheet. 11 12 13 14 JIM INSKEEP DATE 15 16 17 18 19 20 21 22 23 24 25 </div>

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<p>82</p> <p>1 STATE OF INDIANA) 2) SS: 3 COUNTY OF JOHNSON) 4 5 CERTIFICATE 6 7 I, Valerie Fillenwarth, RPR, a Notary 8 Public in and for the County of Johnson, State 9 of Indiana, maintaining an office in Johnson 10 County, Indiana, do hereby certify the 11 following: 12 13 That the witness herein, JIM INSKEEP, was 14 first duly sworn to tell the truth, the whole 15 truth and nothing but the truth in the 16 foregoing deposition; 17 18 That all testimony was taken down in 19 stenographic notes and afterward reduced to 20 typewritten form under my direction and then 21 presented to counsel for the purpose of 22 obtaining the deponent's signature; 23 24 That I recorded and transcribed any and 25 all objections made by counsel and the reasons</p>	
<p>83</p> <p>1 therefore; and 2 3 That I am not a relative or employee, 4 attorney or counsel of any of the parties, nor 5 a relative or employee of such attorney or 6 counsel, nor am I financially interested in 7 this action. 8 9 IN WITNESS HEREOF, I have hereunto set my 10 hand and affixed my Notarial Seal this 1st day 11 of March 2021. 12 13 14 15 16 17 Valerie Fillenwarth, RPR 18 Notary Public 19 20 21 22 23 Commission Number: NP0669434 24 County of Residence: Johnson 25 My Commission Expires on: June 22, 2023</p>	

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